

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-
GUERRA, MICHAEL MAERLENDER, BRANDON
PIYEVSKY, BENJAMIN SHUMATE, BRITTANY
TATIANA WEAVER, and CAMERON WILLIAMS,
individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE
OF TECHNOLOGY, UNIVERSITY OF CHICAGO,
THE TRUSTEES OF COLUMBIA UNIVERSITY IN
THE CITY OF NEW YORK, CORNELL
UNIVERSITY, TRUSTEES OF DARTMOUTH
COLLEGE, DUKE UNIVERSITY, EMORY
UNIVERSITY, GEORGETOWN UNIVERSITY, THE
JOHNS HOPKINS UNIVERSITY, MASSACHUSETTS
INSTITUTE OF TECHNOLOGY, NORTHWESTERN
UNIVERSITY, UNIVERSITY OF NOTRE DAME DU
LAC, THE TRUSTEES OF THE UNIVERSITY OF
PENNSYLVANIA, WILLIAM MARSH RICE
UNIVERSITY, VANDERBILT UNIVERSITY, and
YALE UNIVERSITY,

Defendants.

Case No. 1:22-cv-00125

Hon. Matthew F. Kennelly

**PLAINTIFFS' MOTION TO SEAL THEIR AMENDED AND RENEWED MOTION TO
COMPEL THE PRODUCTION OF THE EDUCATION RECORDS OF THE 35
GEORGETOWN AND PENN STUDENTS WHO HAVE NOT FILED OBJECTIONS TO
SUCH PRODUCTION UNDER FERPA**

Pursuant to the Confidentiality Order in this case (ECF No. 254) and Local Rule 26.2,
Plaintiffs respectfully request that the Court grant this Motion to File Under Seal their Amended
and Renewed Motion to Compel the Production of the Education Records of the 35 Georgetown

and Penn Students who have not Filed Objections to Such Production Under FERPA. In support of their Motion, Plaintiffs state as follows:

1. The motion at issue discusses, references, and appends certain information designated as Confidential and Attorneys' Eyes Only under the terms of the Confidentiality Order.

2. In accordance with Local Rule 26.2(c), the motion at issue will continue to be provisionally under seal, but an unredacted version will be provided to counsel and the Court. In addition, a redacted (public) version will be filed via the ECF system within 14 days.

WHEREFORE, Plaintiffs respectfully request that this Court grant Plaintiffs' motion.

Dated: December 1, 2023

/s/ Robert D. Gilbert

Robert D. Gilbert

Elpidio Villarreal

Robert S. Raymar

David Copeland

Steven Magnusson

**GILBERT LITIGATORS &
COUNSELORS, P.C.**

11 Broadway, Suite 615

New York, NY 10004

Phone: (646) 448-5269

rgilbert@gilbertlitigators.com

pdvillarreal@gilbertlitigators.com

rraymar@gilbertlitigators.com

dcopeland@gilbertlitigators.com

smagnusson@gilbertlitigators.com

Respectfully Submitted,

/s/ Edward J. Normand

Devin "Vel" Freedman

Edward J. Normand

Peter Bach-y-Rita

Richard Cipolla

**FREEDMAN NORMAND
FRIEDLAND LLP**

99 Park Avenue

Suite 1910

New York, NY 10016

Tel: 646-350-0527

vel@fnf.law

tnormand@fnf.law

pbachyrta@fnf.law

rcipolla@fnf.law

Ivy Ngo

**FREEDMAN NORMAND
FRIEDLAND LLP**

1 SE 3d Avenue

Suite 1240

Miami, FL 33131

Tel: 786-924-2900

ingo@fnf.law

/s/ Eric L. Cramer

Eric L. Cramer
Ellen T. Noteware
David Langer
Jeremy Gradwohl
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Tel: 215-875-3000
ecramer@bm.net
dlanger@bm.net
enoteware@bm.net
jgradwohl@bm.net

Richard Schwartz
BERGER MONTAGUE PC
1720 W Division
Chicago, IL 60622
Tel: 773-257-0255
rschwartz@bm.net

Daniel J. Walker
Robert E. Litan
Hope Brinn
BERGER MONTAGUE PC
2001 Pennsylvania Avenue, NW
Suite 300
Washington, DC 20006
Tel: 202-559-9745
rlitan@bm.net
dwalker@bm.net
hbrinn@bm.net

Counsel for Plaintiffs